

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

KEVIN CLEMENTE and BARBARA  
CLEMENTE

Plaintiffs,

vs.

JANE DOE; TRENDY DIGITAL  
CONSULTING, INC.; MAEHAL  
ENTERPRISES, INC.; GAUNGDA  
LOGISTICS, INC.; AURORRAL TRADE,  
INC.; PENGYUAN, INC.; DANCO  
GLOBAL, INC.; MIDDLESEX TRUCK  
AND AUTO BODY, INC.; WLF TRADING  
LIMITED; HUAYI ACCESS CO.  
LIMITED; WENYENXING LIMITED and  
JOHN DOES 1-10

Defendants.

Civil Action No.: 3:24-cv-00314-  
MAS-JBD

**NOTICE OF MOTION FOR  
PERMANENT INJUNCTIVE  
RELIEF**

To: Middlesex Truck and Auto Body, Inc.  
c/o Brian Maloney  
65 Gerard Street  
Boston, Massachusetts 02119

JPMorgan Chase Bank, N.A.  
Mail Code LA4-7100 / 7200  
700 Kansas Lane  
Monroe, LA 71203

**PLEASE TAKE NOTICE** that on April 7, 2025 at 10:00 a.m. in the forenoon, or as soon thereafter as counsel may be heard, Connell Foley LLP, attorneys for Plaintiffs Kevin Clemente and Barbara Clemente (“Plaintiffs”), will move before the Honorable Michael A. Shipp, U.S.D.J., at the United States District

Court for the District of New Jersey, Clarkson S. Fisher Building & U.S. Courthouse, Trenton, New Jersey, for an Order granting Plaintiff's Motion for Permanent Injunctive Relief compelling JPMorgan Chase Bank, N.A. to turnover to Plaintiffs the \$133,565.00 that was transferred into the account ending in 1740 in the name of Defendant Middlesex Truck and Auto Body, Inc. on or about April 12, 2023; and

**PLEASE TAKE FURTHER NOTICE** that in support of the Motion, Plaintiffs shall rely upon the Verified Complaint, the Certification of Plaintiff Kevin Clemente, with exhibits, the Affidavit of Brian Maloney, with exhibits, and the Memorandum of Law submitted herewith; and

**PLEASE TAKE FURTHER NOTICE** that Plaintiffs will request that the proposed form of Order submitted herewith be entered by the Court.

BY: /s/ Aaron H. Gould

Leo J. Hurley, Jr.  
Aaron H. Gould  
**CONNELL FOLEY LLP**  
Harborside 5  
185 Hudson Street, Suite 2510  
Jersey City, NJ 07311  
*Attorneys for Plaintiffs Kevin  
Clemente and Barbara Clemente*

Dated: March 10, 2025